

**IN THE SUPERIOR COURT OF GWINNETT COUNTY  
STATE OF GEORGIA**

**LATNEY A. RUSSELL,**

**Plaintiff,**

**VS.**

**FLIXBUS INC,**

**Defendant.**

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**CIVIL ACTION FILE NO.:**

***JURY TRIAL DEMANDED***

**PLAINTIFF'S VERIFIED COMPLAINT FOR NEGLIGENCE,  
ASSAULT, BATTERY, THEFT AND OTHER RELATED RELIEF**

COMES NOW, **LATNEY A. RUSSELL**, Plaintiff in the above-styled and stated matter, herein referenced as "Plaintiff" or "Mr. Russell" states this, his Complaint for Negligence, Assault, Battery, Theft and Other Related Relief against the above-named Defendant, **FLIXBUS LLC**, herein referenced as "Defendant" or "Flixbus". In support whereof, Plaintiff respectfully shows as follows:

**JURISDICTION AND VENUE**

1.

Although Plaintiff is a resident of the State of Massachusetts and County of Essex, Defendant is subject to the jurisdiction and venue of this Court, as stated in Georgia Code § 9-10-93. Under said statute, venue shall lie in any county wherein a substantial part of the business was transacted, the tortious act, omission, or injury occurred, or the real property is located. Where an action is brought against a resident of this state, any nonresident of this state who is involved in the same transaction or occurrence and who is suable under the provisions of this article may be joined as a defendant in the county where a resident defendant can be tried. Venue is proper in the Superior Court of Gwinnett County as the occurrence took place there. Service may be

acknowledged. If service is not acknowledged, service of the Summons and Complaint for Negligence, Assault and Battery, Theft and Other Related Relief may be perfected according to law.

2.

This Court has jurisdiction of matters set forth in this Complaint

3.

Venue over the matters set forth in this Complaint are proper.

### **BACKGROUND**

4.

On May 11, 2022, the Plaintiff was the victim of an assault/theft by a passenger onboard a scheduled FlixBus route from New York City, NY to Atlanta, GA. The Plaintiff and his mother began their travels from Boston, MA, and arrived in New York City. Upon arrival in New York City, NY, the Plaintiff and his mother attempted to board FlixBus but instead, was presented with a third-party partner bus. During this trip, there was theft and assault due to the negligence of the third-party company, which could have been avoided if the proper safety standards were in place. The Plaintiff was misled into taking a trip with a subpar company disguised as a company with up to par safety standards and adherence to federal guidelines regarding motorbus transport.

5.

In an attempt to rectify the situation without the involvement of litigation, the Plaintiff made attempts to reach a settlement agreement with no response from the Defendant. In addition to the attempts, a Demand Letter dated August 15, 2022, was mailed to the Defendant. A true and correct copy of said letter is hereto attached as **Exhibit "A"**.

*Remainder of this page intentionally left blank*

6.

As of the date of this filing, the Defendant has failed to respond to the request for settlement or reconciliation based on the negligence, assault, battery and theft that occurred while using their services.

**COUNT ONE – NEGLIGENCE**

7.

Plaintiff incorporates all the above paragraphs as if they were fully set forth in the paragraphs herein.

8.

Defendant failed to adhere to *Georgia Code § 51-3-2*, which states that the company and/or its owners, are wholly liable for the safety of their passengers. This failure to adhere was a blatant display of negligence on their part.

9.

Defendant failed to provide preliminary safety information prior to the departure of the bus. If this information had been provided, the theft may have been prevented as it would have increased awareness during the trip.

10.

Defendant failed to adhere to *Title 49 of the Code of Federal Regulations, Subtitle B, § 374.403, sections A and B*, by failing to mandate bag identification tags. According to this statute, passenger items must be appropriately identified.

11.

Defendant failed to communicate with the passengers before initiating his route as specified under *Title 49 of the Code of Federal Regulations, Subtitle B, § 374.305, section e*. This failure to communicate is a clear violation of federal laws that guard the safety of passengers.

12.

Defendant negligently failed to provide enough access to charging ports in the third-party carrier bus, which is a high-risk safety issue, as accessibility to emergency services would be limited, further endangering the passengers. If Flixbus provided the originally agreed upon bus at the time of the occurrence, then many of the aforementioned issues may have been avoided.

13.

Due to the series of preceding negligent events by Flixbus, the Plaintiff ended up on the receiving end of an altercation with another passenger, resulting in injuries. The origin of this incident was due to the limited availability of charging ports and suspicion of theft. Plaintiff herein states the following as if stated verbatim to the presiding Judge (**referenced from Exhibit “A”**):

**“A) The suspect boarded the bus in Washington, D.C. An hour into the trip he removed my mother’s charger from the port and placed his charger there. When I noticed my mother’s phone was unplugged, I was in disbelief that a stranger removed her phone charger without asking first. This was a huge red flag from the suspect, as he felt comfortable removing something that did not belong to him.**

**B) We ended up stopping for lunch in the early hours of the morning, and once we returned to the coach. I noticed the suspect was now sitting in the empty seat in front of me where the charging port was located. The suspect charging wire was too short, so he switched seats to comfortably charge his phone.**

**C) I took a nap while we were in the Carolinas. I woke up before we approached the Indian Creek stop and noticed my charger was missing. I asked the suspect if he had removed my charger and he replied “No”. I checked under the seat with my flashlight on my phone and did not see any signs of my charger.**

**D) The coach pulled into the Indian Creek train station and while the driver was**

distributing the luggage. I asked the suspect if he had seen my charger. The suspect replied “No” and then opened his bag, and immediately, I noticed my long iPhone charger rolled up in his bag. I asked him where the plug to my charger was, and he launched at me with a punch to the face. He threw me to the ground hitting my head on the concrete and proceeded to punch me all over my body. The driver stood by and did nothing to deal with the assault. Once the passengers on board noticed what was happening, they ran off the bus and pulled the suspect off me. The suspect tried, even more, to come after me and my mother got off the bus and said, “leave my son alone, that is my child”. As you can see, there was a lack of safety measures in place by the bus company.

E) I got back on the bus and immediately called the police. I was traumatized and didn’t realize what had happened. The police kept asking me where we were, and I told her the Indian Creek station bus stop. The driver had already pulled off and left the scene of the crime and only cared about finishing his route, which prevented a proper investigation. Again, this is blatant negligence which must be addressed.

F) At the final stop, we arrived at Civic Center and exited the coach and noticed our luggage was missing. I immediately started to record the chaos because this was a nightmare that no one would believe. The passengers told the driver he should not have left the Indian Creek station. The police officer called me back and stated that they informed Atlanta police, and they were enroute.

G) Once Atlanta police arrived, they told us we would have to go back because that was not their jurisdiction. I put my mother in an uber and waited for the ambulance to arrive. I was admitted and treated for my injuries at WellStar hospital. I was discharged in the evening, so I went to the Gwinnett County police station to

**file a police report. The officer had called me back and stated that when they arrived at Indian Creek, they noticed some pieces of luggage at the bus stop. These pieces of luggage belonged to me and the other passengers. After identifying my luggage with the officers, it was returned to me. Due to the negligence brought on by the bus driver, there were additional fees, stress and burden involved in the transport back to Gwinnett County.”**

14.

Defendant failed to interject or contact law enforcement during the course of the incident, which further put the passengers at risk and clearly demonstrated negligence.

15.

Plaintiff is entitled to compensation for damages due to the Defendant’s blatant negligence.

### **COUNTY TWO – ASSAULT AND BATTERY**

16.

Plaintiff incorporates all the above paragraphs as if they were fully set forth in the paragraphs herein.

17.

Propounded by the actions of the Defendant, Plaintiff was attacked by a passenger while using Flixbus’ services, due to direct negligence on their part. If the third-party bus put forth by Flixbus did not meet the standards promoted by Flixbus, then they should not have been used. The use of this carrier was the origin of the altercation, as the basis of the incident was a lack of enough charging ports and suspicion of theft of the Plaintiff’s items by another passenger.

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18.

The Defendant's failure to contact law enforcement led to the Plaintiff contacting the Gwinnett County Police Department and having the officer take a police report to document the incident, originating from the Defendant's negligence. A true and correct copy of said report is hereto attached as **Exhibit "B"**.

19.

Plaintiff is entitled to compensation for damages due to the Defendant's cause of assault and battery.

**COUNT THREE – PAIN AND SUFFERING**

20.

Plaintiff incorporates all the above paragraphs as if they were fully set forth in the paragraphs herein.

21.

Plaintiff has suffered and continues to suffer from extreme mental anguish, depression, anxiety, and ennui due to this series of events.

22.

Plaintiff has suffered injuries as a result of the altercation which occurred as a result of negligence. A true and correct copy of the redacted medical bills and expenses related to this incident are hereto attached as **Exhibit "C"**.

23.

This failure by the Defendant to follow simple Federal Travel Safety Guidelines has completely altered the way of life for the Plaintiff due to the downstream effects of this incident.

24.

Plaintiff has suffered a substantial loss of wages due to the injuries, treatment, and follow up related to this incident. A true and correct copy of the Doctors note received by the Plaintiff is hereto attached as **Exhibit “D”**.

25.

Plaintiff is entitled to compensation for damages due to the Defendant’s physical and mental harm to the Plaintiff.

**COUNT FOUR – THEFT**

26.

Plaintiff incorporates all the above paragraphs as if they were fully set forth in the paragraphs herein.

27.

Defendant failed to protect the Plaintiff’s luggage by failing to adhere to *Title 49 of the Code of Federal Regulations, Subtitle B, § 374.403, sections A and B*. This statute established the use of identifying tags, which the third-party bus did not provide. This negligence has resulted in theft of the Plaintiff’s items during the aforementioned incident.

28.

Plaintiff is entitled to compensation for the theft that occurred as a direct result of negligence by the Defendant.

29.

Due to the aforementioned failures by Flixbus, the Plaintiff asks that the court sanction the Defendant by compelling a mandatory review of their policies, protection measures and the implementation of specific training related to this incident to ensure future compliance by the Defendant. Specifically, Flixbus can improve their services by providing the following:



- A) Training for FlixBus drivers and partner drivers to deal with theft and assault and enforce Federal guidelines that were put in place to protect passengers;
- B) Introduce bag tags to minimize theft;
- C) Ensure that all partner buses meet the requirements of having sufficient charging ports with functional amenities. E.g., WiFi, AC.

#### **SUPPORTING STATEMENTS AND LEGAL STANDARD**

A) **Under Georgia Code 51-12-33;** Reduction and apportionment of award or bar of recovery according to percentage of fault of parties and nonparties.

(a) Where an action is brought against one or more persons for injury to person or property and the plaintiff is to some degree responsible for the injury or damages claimed, the trier of fact, in its determination of the total amount of damages to be awarded, if any, shall determine the percentage of fault of the plaintiff and the judge shall reduce the amount of damages otherwise awarded to the plaintiff in proportion to his or her percentage of fault.

(b) Where an action is brought against more than one person for injury to person or property, the trier of fact, in its determination of the total amount of damages to be awarded, if any, shall after a reduction of damages pursuant to subsection (a) of this Code section, if any, apportion its award of damages among the persons who are liable according to the percentage of fault of each person. Damages apportioned by the trier of fact as provided in this Code section shall be the liability of each person against whom they are awarded, shall not be a joint liability among the persons liable, and shall not be subject to any right of contribution.

(c) In assessing percentages of fault, the trier of fact shall consider the fault of all persons or entities who contributed to the alleged injury or damages, regardless of whether the person or entity was, or could have been, named as a party to the suit.

(d)(1) Negligence or fault of a nonparty shall be considered if the plaintiff entered into a settlement agreement with the nonparty or if a defending party gives notice not later than 120 days prior to the date of trial that a nonparty was wholly or partially at fault.

(2) The notice shall be given by filing a pleading in the action designating the nonparty and setting forth the nonparty's name and last known address, or the best identification of the nonparty, which is possible under the circumstances, together with a brief statement of the basis for believing the nonparty to be at fault.

(e) Nothing in this Code section shall eliminate or diminish any defenses or immunities which currently exist, except as expressly stated in this Code section.

(f)(1) Assessments of percentages of fault of nonparties shall be used only in the determination of the percentage of fault of named parties.

(2) Where fault is assessed against nonparties pursuant to this Code section, findings of fault shall not subject any nonparty to liability in any action or be introduced as evidence of liability in any action.

(g) Notwithstanding the provisions of this Code section or any other provisions of law which might be construed to the contrary, the plaintiff shall not be entitled to receive any damages if the plaintiff is 50 percent or more responsible for the injury or damages claimed.

B) **Under Georgia Code § 51-3-2**, Torts Chapter 3 - Liability of Owners and Occupiers of Land, Article 1 - General Provisions, the owner(s) of FlixBus are wholly liable for the safety of their passengers. In this instance there was a failure to adhere.

C) **. Title 49 of the Code of Federal Regulations, Subtitle B, § 374.305**, section e, ticketing, and information, states the following:

(1) During business hours at each terminal or station, information shall be provided as to schedules, tickets, fares, baggage, and other carrier services.

(2) Carrier agents and personnel who sell or offer to sell tickets, or who provide information concerning tickets and carrier services, shall be competent and adequately informed.

(b) Telephone information service. Every facility where tickets are sold shall provide telephonic information to the traveling public, including current bus schedules and fare information, when open for ticket sales.

(c) Schedules. Printed, regular-route schedules shall be provided to the traveling public at all facilities where tickets for such services are sold. Each schedule shall show the points along the carrier's route(s) where facilities are located or where the bus trips originate or terminate, and each schedule shall indicate the arrival or departure time for each such point.

(d) Ticket refunds. Each carrier shall refund unused tickets upon request, consistent with its governing tariff, at each place where tickets are sold, within 30 days after the request.

(e) Announcements. No scheduled bus (except for commuter service) shall depart from a terminal or station until a public announcement of the departure and boarding point has been given. The announcement shall be given at least 5 minutes before the initial departure and before departures from points where the bus is scheduled to stop for more than 5 minutes.

D) **Title 49 of the Code of Federal Regulations, Subtitle B, § 374.305** states that:

(a) All motor carriers of passengers and baggage subject to 49 U.S.C. subtitle IV, part B, which provide in their tariffs for the declaration of baggage in excess of a

free baggage allowance limitation, shall provide clear and adequate notice to the public of the opportunity to declare such excess value on baggage.

(b) The notice referred to in [paragraph \(a\)](#) of this section shall be in large and clear print, and shall state as follows:

Under FMCSA regulations, all baggage must be properly identified. Luggage tags should indicate clearly the name and address to which lost baggage should be forwarded. Free luggage tags are available at all ticket windows and baggage counters.

The statement of charges for excess value declaration shall be clear, and any other pertinent provisions may be added at the bottom in clear and readable print.

(c) The notice referred to in [paragraphs \(a\)](#) and [\(b\)](#) of this section shall be

(1) placed in a position near the ticket seller, sufficiently conspicuous to apprise the public of its provisions,

(2) placed on a form to be attached to each ticket issued (and the ticket seller shall, where possible, provide oral notice to each ticket purchaser to read the form attached to the ticket),

(3) placed in a position at or near any location where baggage may be checked, sufficiently conspicuous to apprise each passenger checking baggage of its provisions, and

(4) placed in a position at each boarding point or waiting area used by the carrier at facilities maintained by the carrier or its agents, sufficiently conspicuous to apprise each boarding passenger of the provisions of the said notice.

**STATEMENT OF CLAIM**

**Claim:** *NEGLIGENCE, ASSAULT, BATTERY, THEFT AND OTHER RELATED RELIEF*

1. The Court has jurisdiction over the Defendant(s); the Defendant(s) are residents of Hudson County, NJ; Venue is proper per Georgia Code § 9-10-93 as the occurrence took place there.

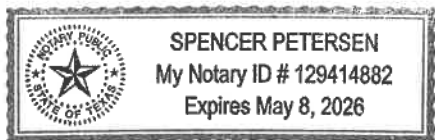
2. Plaintiff(s) claims the Defendant(s) is/are indebted to the Plaintiff as follows:

- a) Negligence
- b) Assault and Battery
- c) Theft
- d) Pain and Suffering

3. That said claim is in the amount of: \$ 600,000.00 principal, 10% interest, plus all future costs of this suit. State of Georgia, Gwinnett County: being duly sworn on oath, says the foregoing is a just and true statement of the amount owing by defendant to plaintiff, exclusive of all set-offs and just grounds of defense.

STATE OF Texas  
COUNTY OF Dallas

Sworn to (or affirmed) and subscribed before me, by means of ☒ physical presence or ☐ online notarization, this 27<sup>th</sup> day of October 2022, by Lathen Russell.



[Signature]  
NOTARY PUBLIC

Spencer Petersen  
{Print, type, or stamp commissioned name of notary or deputy clerk.}

       Personally known  
X Produced identification  
Type of identification produced MA ID

**WHEREFORE**, Plaintiff respectfully prays as follows:

- (a) That process issue and Defendant be served according to law;
- (b) That the Defendant be ordered and required to fully comply with this Court's Final Judgment in this matter;
- (c) That the Court, in making its finding of neglect or harm and impose appropriate sanctions on the Defendant;
- (d) That this court award damages to Plaintiff and against Defendant in an amount to be proven at trial;
- (e) That this court compel the Defendant to implement procedures to further strengthen passenger safety;
- (f) That this court allow trial by jury for all applicable issues;
- (g) That Plaintiff have such other and further relief as this Court considers just and equitable.

Respectfully submitted, this 27<sup>th</sup> day of October 2022.

  
\_\_\_\_\_  
LATNEY A. RUSSELL (PLAINTIFF)

***PLAINTIFF'S EXHIBIT "A"***

**Latney A. Russell**  
170 Washington Street #T5  
Haverhill, MA 01843  
(404) 423-0454  
[Ralatney@gmail.com](mailto:Ralatney@gmail.com)

**DEMAND LETTER FOR MONETARY COMPENSATION**

August 15, 2022

Registered Agents Inc.  
159 Main Street, S100  
Nashua, NH, 03060, USA

RE: Demand for Monetary Compensation for Negligence, Assault and Battery and Theft

To Whom It May Concern,

On May 11, 2022, I was the victim of an assault/theft by a passenger onboard a scheduled FlixBus route New York City, NY to Atlanta, GA. My mother and I began our travels from Boston, MA, and arrived in New York City; this is where we attempted to board FlixBus but instead, was presented with a third-party partner bus. During this trip, there was theft and assault due to the negligence of the third-party company, which could have been avoided if the proper safety standards were in place. I was misled into taking a trip with a subpar company disguised as a company with up to par safety standards and adherence to federal guidelines regarding motorbus transport.

Under Georgia Code § 51-3-2, Torts Chapter 3 - Liability of Owners and Occupiers of Land, Article 1 - General Provisions, the owner(s) of FlixBus are wholly liable for the safety of their passengers. In this instance there was a failure to adhere. The breach in adherence and gross negligence is supported by the following summary of events:

## **Summary of Events**

1. I booked two tickets on May 9, 2022, for FlixBus, from New York City, NY to Atlanta Georgia for myself and my mother.
2. My mother and I arrived at the station and asked each driver if their bus was the Atlanta Bus. The last driver informed us that the Atlanta bus was the partnering company bus parked along the side of the building.
3. This was of course a huge red flag because I know that the partner bus does not uphold the FlixBus standards. (e.g., no WiFi, no AC, no charging ports, and dirty restrooms).
4. Once we boarded the partnering company's bus, the first thing we noticed was that there was a shortage of charging ports. Passengers would have to be sitting near a charging port or would have had to switch seats to be near one. A failure to provide charging ports is a serious safety issue as the ability to call emergency services is impeded by limited power.
5. The driver boarded the bus and started his route without communicating with the passengers. **Under Title 49 of the Code of Federal Regulations, Subtitle B, § 374.305, section e, ticketing, and information,** Federal laws that guard the safety of passengers were blatantly broken.
6. Pre-Trip Safety Information was not given. Such as emergency exits, seat belt use, emergency contact, driver direction, fire extinguisher, restroom emergency push button or switch and avoiding slips and falls.
7. If we were on FlixBus instead of the partnering company bus (Williams Charters), the chances of this occurring would be minimized. FlixBus (green buses) has sufficient ports for every passenger to charge their electronic devices. It was bait and switch, the route



was shown as operated by FlixBus, but when we arrived at the station, it was the partner company.

8. If the Pre-Trip Safety Information was given by both drivers, the chances of theft and assault occurring would have been greatly reduced. I would have immediately alerted the driver to call the police because my personal belongings were stolen.
9. The suspect boarded the bus in Washington, D.C. An hour into the trip he removed my mother's charger from the port and place his charger there. When I noticed my mother's phone was unplugged, I was in disbelief that a stranger removed her phone charger without asking first. This was a huge red flag from the suspect, as he felt comfortable removing something that did not belong to him.
10. We ended up stopping for lunch in the early hours of the morning, and once we returned to the coach. I noticed the suspect was now sitting in the empty seat in front of me where the charging port was located. The suspect charging wire was too short, so he switched seats to comfortably charge his phone.
11. I took a nap while we were in the Carolinas. I woke up before we approached the Indian Creek stop and noticed my charger was missing. I asked the suspect if he had removed my charger and he replied "No". I checked under the seat with my flashlight on my phone and did not see any signs of my charger.
12. The coach pulled into the Indian Creek train station and while the driver was distributing the luggage. I asked the suspect if he had seen my charger. The suspect replied "No" and then opened his bag, and immediately, I noticed my long iPhone charger rolled up in his bag. I asked him where the plug to my charger was, and he launched at me with a punch to the face. He threw me to the ground hitting my head on the concrete and proceeded to

punch me all over my body. The driver stood by and did nothing to deal with the assault. Once the passengers on board noticed what was happening, they ran off the bus and pulled the suspect off me. The suspect tried, even more, to come after me and my mother came off the bus and said, "leave my son alone, that is my child". As you can see, there was a lack of safety measures in place by the bus company.

13. I got back on the bus and immediately called the police. I was traumatized and didn't realize what had happened. The police kept asking me where we were, and I told her the Indian Creek station bus stop. The driver had already pulled off and left the scene of a crime and only cared about finishing his route which prevented a proper investigation. Again, this is blatant negligence which must be addressed.
14. At the final stop, we arrived at Civic Center and exited the coach and noticed our luggage was missing. I immediately started to record the chaos because this was a nightmare that no one will believe. The passengers told the driver he should not have left the Indian Creek station. The police officer called me back and stated that they informed Atlanta police, and they were enroute.
15. Once Atlanta police arrived, they told us we would have to go back because that was not their jurisdiction. I put my mother in an uber and waited for the ambulance to arrive. I was admitted and treated for my injuries at WellStar hospital. I was discharged in the evening, so I went to the Gwinnett County police station to file a police report. The officer had called me back and stated that when they arrived at Indian Creek, they noticed some pieces of luggage at the bus stop. These pieces of luggage belonged to me and the other passengers. After identifying my luggage with the officers, it was returned to

me. Due to the negligence brought on by the bus driver, there were additional fees, stress and burden involved in the transport back to Gwinnett County.

16. Currently, the police have not been able to retrieve footage from the bus station or from onboard the partnering company's bus. We would have to wait and see if the suspect stole our luggage and brought them back or if there was an error on the driver's part.
17. Having something as simple as bag tags could have easily prevented the luggage theft from occurring. This is another clear violation from FlixBus and its partnering company, the failure to provide or mandate bag tags. The violation is supported by Title 49 of the Code of Federal Regulations, Subtitle B, § 374.403, sections A and B.

### **Final Review**

- The trip was booked with FlixBus and instead was given transport by a third-party partnering company's bus with insufficient safety standards.
- Under Title 49 of the Code of Federal Regulations, Subtitle B, § 374.305, section e, ticketing and information, Federal laws that guard the safety of passengers were blatantly broken as the drivers failed to communicate to the passengers as required before departing the boarding point.
- Physical assault and theft - This could have been prevented with systems and protocols in place for all driver's whether directly employed or work as a partner.
- Bag tags – Should always be used when operating a passenger bus with more than 15 passengers to ensure passengers are not stealing luggage's that does not belong to them.
- A lack of security at bus stops – This would greatly reduce the chance of an assault taking place, knowing that the property had security present.

## **Damages**

1. Ongoing treatment for head injuries.
2. Pain and Suffering.
3. Emotional Distress.
4. Loss of Consortium.
5. Ruined Vacation.
6. Medical Expenses.
7. Loss Wages.
8. Loss of Potential Future Wages.
9. Punitive Damages.

The purpose of this letter is to explore whether this matter can be satisfactorily resolved without resort to litigation. To ensure that such heinous crimes does not happen again and as redress for my injuries, I am seeking from FlixBus Inc, the following:

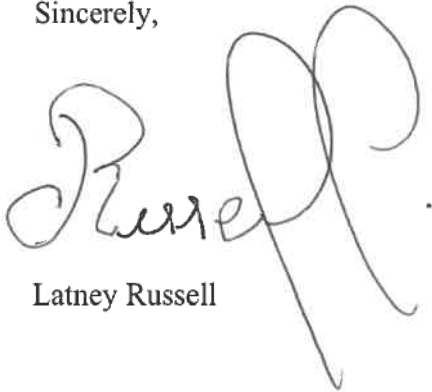
- Monetary compensation in the amount of \$495,000.00 for emotional distress, punitive damages, physical harm and theft that occurred whiles using your service.
- Training for FlixBus drivers and partner drivers to deal with theft and assault and enforce Federal guidelines that were put in place to protect passengers.
- Introduce bag tags to minimize theft.
- Ensure that all partner buses meet the requirements of having sufficient charging ports with functional amenities. E.g., WiFi, AC.

This letter is submitted with a view toward compromise, and such statements made with a view towards compromise are inadmissible at trial. Thus, this correspondence is intended for settlement purpose only.

This shall serve as a pre-suit letter demanding that you provide written assurance within ten (10) days that you will comply with the settlement request related to the aforementioned violations. I look forward to working towards the prompt and amicable resolution of this matter within (10) days of receipt of this letter.

This notice has been served upon, if you are represented by legal counsel, please direct this letter to your attorney immediately and have your attorney make notice of such representation.

Sincerely,

A handwritten signature in black ink, appearing to read "Latney Russell", with a large, stylized flourish extending from the end of the signature.

Latney Russell

## PLAINTIFF'S EXHIBIT "B"



GWINNETT COUNTY  
POLICE DEPARTMENT  
INCIDENT REPORT  
CASE NUMBER: GP220038910

<b>Premise</b>									
Reported Date 05/11/2022 13:19:00			Incident Start Date 05/11/2022 06:05:00			Incident End Date 05/11/2022 06:50:00			Family Violence NO
Commonplace Name									
Incident Address 1860 INDIAN TRAIL LILBURN RD NW					Cross Street			Apartment	Building
City NORCROSS		County		State GA	Zip 30093		Precinct WEST SIDE		Zone 142
<b>Administrative Section</b>									
Juvenile(s) Involved NO		Gang Related NO		Use of Force NO		First Aid Administered NONE			
Overdose NO	Overdose Death		Possible Mental Health Issue			Human Trafficking NO		Surveillance System OTHER CAMERA SYSTEM	
Premise Vacant NO		Premise Under Construction NO			Victim will Prosecute YES		Case Status ACTIVE		
Exceptional Clearance NOT APPLICABLE (NOT CLEARED EXCEPTIONALLY)									Clearance Date
Solvability UNKNOWN						Uniform Follow-up NO		Photos Taken NO	CSI Called NO
CID Called NO	Forward to CID YES		Impound NO	Written Statement(s) NO	Related to a Gwinnett County Loss Notice NO			Which Loss Type	
<b>Offense 1</b>									
GA Statute 16-5-23.1		Statute Description BATTERY [13B] [MIS]							
Felony/Misdemeanor MISDEMEANOR		Degree	Counts 1	Attempted/Completed COMPLETED		Location Type AIR/BUS/TRAIN TERMINAL			
Bias Motivation NONE						Offender Suspected of Using NOT APPLICABLE		Cargo Theft	
Criminal Activity/Gang Info									
Weapon Types PERSONAL WEAPONS (HANDS; FIST; FEET; ETC.)									
Weapon Automatic 1			Weapon Automatic 2			No. Premises Entered		Method of Entry	
<b>Suspect 1</b>									
Related Offense 1 16-5-23.1 BATTERY [13B] [MIS]									
Name (Last, First, Middle, Suffix) UNKNOWN,								Moniker	
Race BLACK OR AFRICAN AMERICAN				Ethnicity NON-HISPANIC		Sex MALE	Date of Birth	Age 28 - 36	SSN
License Number		License State		Hair Color		Eye Color BROWN		Weight 180	Height 6'00"
Build MEDIUM BUILD		Facial Hair			Teeth		Suspect Resident of Jurisdiction UNKNOWN		
<b>Suspect Scars Marks Tattoos</b>									
SMT		NCIC Code		Description			Location		
No Suspect SMT									
Home Phone		Cell Phone		Email					

Misc. ID Type		Misc. ID State		Misc ID Number			
Address						Apartment	Building
City		State		Zip			
<b>Alias Information</b>							
Suspect Alias				SSN		Date of Birth	
No Known Alias							
<b>Clothing Information</b>							
HAT: BLACK ; JACKET: BLACK; PANTS/DRESS/SKIRT: BLACK; EYE WEAR: NONE; SHOES: BLACK;							
<b>Occupational Information</b>							
Occupation Code/Description			Employer Name			Phone	
Address						Suite	Building
City		State		Zip			
<b>Victim - Person 1</b>							
Victim Type PERSON/INDIVIDUAL (NOT A LAW ENFORCEMENT OFFICER)							
Related Offense 1 16-5-23.1 BATTERY [13B] [MIS]							
Relationship to Offender 1 UNKNOWN, SUSPECT ; STRANGER							
Name (Last, First Middle Suffix) RUSSELL, LATNEY						Moniker	
Race BLACK OR AFRICAN AMERICAN		Ethnicity NON-HISPANIC		Sex MALE	Date of Birth [REDACTED] 980	Age 41	SSN [REDACTED]
Hair Color BLACK		Eye Color BROWN		Weight 165	Height 5'10"	Build	Facial Hair
Teeth						Resident of Jurisdiction RESIDENT	
Agg Assault Circumstances							
<b>Victim Scars Marks Tattoos</b>							
SMT		NCIC Code		Description		Location	
No Victim SMT							
Home Phone		Cell Phone [REDACTED]		Email			
Misc. ID Type		Misc. ID State		Misc ID Number			
Suspected of Using NOT APPLICABLE							
Injuries APPARENT MINOR INJURY							
Address 170 WASHINGTON ST						Apartment T5	Building
City HAVERHILL		State MA		Zip 01832			
<b>Person Crime Supplemental</b>							
Taken to Hospital NO		Hospital				By Whom	



Victim Person 1	M.E. Notified NO	M.E. Notified by Whom		Date/Time M.E. Notified
	General			
	Suspect Made Victim			
	Suspect Demanded			
	Suspect Demeanor			
	Occupation Information			
	Occupation Code/Description		Employer Name	Phone
	Address			Suite
	City	State	Zip	

### Narrative 1

BWC ACTIVATED

ON MAY 11, 2022, I WAS DISPATCHED TO AN ASSAULT AT 1860 INDIAN TRAIL LILBURN RD. THE SUBJECT LATNEY RUSSELL, AND THE SUSPECT WERE NOT ON SCENE. I MADE CONTACT WITH MR. RUSSELL VIA TELEPHONE CALL. HE STATED THAT HE WAS CURRENTLY AT WELLSTAR GETTING CHECKED AND WOULD MEET WITH ME LATER IN THE DAY AT WEST PRECINCT TO REPORT THE ASSAULT.

WHEN MR. RUSSELL CAME TO THE PRECINCT, HE STATED THAT HE WAS ON A FLEX BUS HEADING FROM BOSTON, MA TO ATLANTA, GA. MR. RUSSELL SAID DURING HIS TRAVEL, A MALE, WEARING ALL BACK THAT WAS SITTING INFRONT OF HIM, HAD TAKEN HIS MOTHER'S CHARGER AND HE HAD CONFRONTED HIM ABOUT IT. MR. RUSSELL SAID THAT HE WENT TO SLEEP AND WOKE UP WHEN HE ARRIVED AT THE ABOVE ADDRESS. HE STATED THAT HE WAS MISSING HIS CHARGER AND LOOKED AROUND FOR IT. HE STATED THAT HE NOTICED THAT THE SUSPECT HAD MOVED SEATS AND HAD A CHARGER THAT LOOK LIKE THE ONE THAT MR. RUSSELL'S CHARGER.

MR. RUSSELL SAID HE TOLD THE MALE THAT HE TOOK HIS CHARGER. THE MALE STATED THAT HE HAD NOT STOLEN THE CHARGER AND PROCEEDED TO ASK THE DRIVER TO GET OFF AND TAKE HIS LUGGAGE FROM UNDER THE BUS. MR. RUSSELL FOLLOWED HIM OUTSIDE THE BUS TO OBTAIN HIS CHARGER WHEN THE MALE TURNED AND BEGAN HITTING MR. RUSSELL. HE SAID THAT HE FELL TO THE GROUND AND THE MALE CONTINUED TO HIT HIM. THE MALE FINALLY STOPPED AFTER A MOMENT AND FROM THE HELP OF THE BUS DRIVER.

THE BUS THAT MR. RUSSELL WAS TRAVELING IN WAS FLEX BUS #158. MR. RUSSELL SPOKE WITH THE DRIVER OFF THE BUS AND CONFIRMED THAT THERE WERE WORKING CAMERAS ON THE BUS. MR. RUSSELL ALSO STATED THAT THERE WERE CAMERAS OUTSIDE OF THE BUS BUT WAS NOT SURE IF THEY WORKED. I WAS UNABLE TO OBTAIN VIDEO FOOTAGE FROM EITHER SOURCE. I GAVE MR. RUSSELL A CASE NUMBER AND THE NON-EMERGENCY NUMBER. NOTHING FURTHER TO REPORT.

### Officer 1

Officer 1	Involvement Type REPORTING	Officer Name MONTAGUE B2396	Date 05/11/2022 13:18:00
	Shift A	Section WEST	

### Officer 2

Officer 2	Involvement Type APPROVING	Officer Name BRUCE B1106	Date 05/16/2022 08:30:51
	Shift A	Section WEST	



GWINNETT COUNTY  
POLICE DEPARTMENT

## INCIDENT REPORT

CASE NUMBER: GP220038910

**Narrative**

ON 07/19/2022, I SPOKE WITH THE VICTIM, LATNEY RUSSELL REGARDING THE ABOVE CASE NUMBER. RUSSELL STATED HE READ OVER THE ORIGINAL REPORT AND NEEDED TO MAKE A CORRECTION IN THE NARRATIVE. RUSSELL STATED THE PASSENGERS WERE THE ONES THAT PULLED THE SUSPECT OFF HIM, NOT THE DRIVER. NOTHING FURTHER AT THIS TIME.

**Officer(s)**

Involvement Type REPORTING	Officer Name SANCHEZ B2253	Date 07/19/2022 15:07:00	Shift ADMIN	Section UNIFORM DIVISION
Involvement Type APPROVING	Officer Name ASCENZO B499	Date 07/19/2022 17:02:28	Shift ADMIN	Section UNIFORM DIVISION

**PAYMENTSMD**DO NOT MAIL PAYMENTS HERE  
PO BOX 8788  
CORAL SPRINGS, FL 33075-8788**PLAINTIFF'S EXHIBIT "C"**

Patient:

**LATNEY A RUSSELL**

Account number:

**6320**

Bill ID:

**- 4722**

Printed on:

**May 21, 2022**

STMT ▲ 003873

Latney A Russell  
170 Washington St Apt T5  
Haverhill MA 01832-5795**Difficulty paying your bill?**Visit [bill.paymentsmd.com](http://bill.paymentsmd.com) to learn about 0% interest payment plans and more ways to resolve your balance.**Your total is \$1,400.00**You have one bill that is ready to pay. The total amount is due by **Jun 13, 2022**.**SEE BACK FOR DETAILS →**

Total billed \$1,400.00

Total due **\$1,400.00**Visit [bill.paymentsmd.com](http://bill.paymentsmd.com) to add your insurance and we will reprocess your bill.

DETACH AREA BELOW AND SEND WITH PAYMENT

**Ways to Pay****Online**Pay via desktop or mobile:  
[bill.paymentsmd.com](http://bill.paymentsmd.com)

Bill ID: 3752 - 6192 - 4722

**Phone**To pay by phone, call toll-free  
24/7:  
**(877) 308-6738****Mail**Mail check or money order  
with this part of the bill to the  
address on the reverse side.  
Do not send cash.**Scan to pay online.**

Just point your phone's camera at the code to scan. Some phones may require a QR code app.

**Need Help?**Call our team toll-free  
(Mon-Fri 9AM to 5PM EDT)  
**(877) 308-6738**

## Your visit to ATLANTA MEDICAL CENTER

Due date: Jun 13, 2022

Date of service: May 11, 2022 | Clinician: Tasha Price NP, S | ID: [REDACTED] 685

Service category	Billed
Emergency Department Services	\$1,400.00
Diagnostic Radiology	\$0.00
Subtotal billed	\$1,400.00
Insurance covered	- \$0.00
Amount due (subtotal)	\$1,400.00

## Your bill summary

PAYMENTSMD

Total billed	\$1,400.00
<b>Total due</b>	<b>\$1,400.00</b>

Any dispute regarding this statement or any amounts due must be submitted in writing to: P.O. Box 19000, Belfast, ME 04915-4085

Submitting payment in an amount less than the total on this statement shall not constitute an offer to settle any dispute, regardless of any accompanying communication. If you are an attorney's office, representing a patient in a bodily harm injury, please call (866) 645-9721. If you have questions and/or would like to make payment arrangements, please contact our billing office at (877) 308-6738.

Government assistance for COVID-related care has expired. If you are uninsured and your visit was COVID-related, you may be eligible for other assistance. Please contact us to discuss your options.



DETACH AREA BELOW AND SEND WITH PAYMENT

## Mail this slip with check

Account Holder: LATNEY A RUSSELL  
Account Number: [REDACTED] 20  
Bill Amount: \$1,400.00

MAKE CHECK PAYABLE & MAIL TO:

SOUTH FULTON EMERGENCY PHYSICIANS, LLC  
PO BOX 22084  
BELFAST, ME 04915-4117

PAYMENTSMD

6686320A14272



LATNEY RUSSELL's Summary ID: [REDACTED] 3001

Reflects information in our system as of today's date: 10/26/2022

16 Claims found from 05/11/2022 to 10/26/2022

Claim Info	Amount Billed	Copay	Coinsurance	Deductible	Not Covered
<b>SHIH, SHIAO-ANG, MD</b> 09/13/2022 Internal Medicine Claim #022258AHVI	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>KAPOOR, GEETANJALI, MD</b> 07/28/2022 Diagnostic Radiology Claim #022215AXXB	\$96.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>STEWARD HOLY FAMILY HOSPITAL</b> 07/28/2022 Facility / Service Claim #022216BZWU	\$431.26	\$0.00	\$0.00	\$0.00	\$0.00
<b>SEYMOUR, BRIDGET J., MD</b> 06/30/2022 Internal Medicine Claim #022182BBFS	\$509.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>SHIH, SHIAO-ANG, MD</b> 06/13/2022 Internal Medicine Claim #022166ADGT	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>LABORATORY CORP OF AMERICA</b> 06/06/2022 Facility / Service Claim #022164ATKI	\$784.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>SADDI, VENUGOPAL R., MD</b> 06/06/2022 Internal Medicine Claim #022158CMVX	\$250.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>SHIH, SHIAO-ANG, MD</b> 06/01/2022 Internal Medicine Claim #022154ATRQ	\$225.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>SHIH, SHIAO-ANG, MD</b> 05/23/2022 Internal Medicine Claim #022145ASJS	\$285.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>LOZADA, JOHN A., MD</b> 05/16/2022 Emergency Medicine Claim #022154BSPS	\$611.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>HERMAN, RICHARD I., MD</b> 05/16/2022 Radiology Claim #022140AYFY	\$140.00	\$0.00	\$0.00	\$0.00	\$0.00

<b>SINGH, AJAY K., MD</b> 05/16/2022 Diagnostic Radiology Claim #022140AYFT	\$36.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>STEWART HOLY FAMILY HOSPITAL</b> 05/16/2022 Facility / Service Claim #022143BVVY	\$2,334.84	\$0.00	\$0.00	\$0.00	\$0.00
<b>SOUTH FULTON EMERGENCY PHYSICI</b> 05/11/2022 Facility / Service Claim #022172B7IQ	\$1,400.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>WELLSTAR ATLANTA MEDICAL CENTER</b> 05/11/2022 Facility / Service Claim #022291BSIJ	\$14,006.80	\$0.00	\$0.00	\$0.00	Pending
<b>WAZEERUDDIN, SULIEMAN, MD</b> 05/11/2022 Emergency Medicine Claim #022211ANWF	\$1,400.00	\$0.00	\$0.00	\$0.00	\$0.00
<i>Total For Selected Date Range:</i>	<i>\$22958.90</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>



QUANTUM RADIOLOGY PC  
PO Box 1259 Dept. #165956  
Oaks, PA 19456

LATNEY A RUSSELL  
170 WASHINGTON ST APT T5  
HAVERHILL MA 01832-5795



# EZ Ways To Pay...

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**Automated Attendant**  
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For Payments Please Call: 1.855.204.9120 For Billing Questions Please Call: 1.855.871.1526

## STATEMENT

### Account Summary

Account Number	QUN1
Patient Payments in Last 30 Days	0.00
Current Statement Balance	486.00
Charges Pending w/ Insurance	0.00
Total Account Balance	486.00

See Detail on Back

### Insurance Information

PLEASE CONFIRM THAT INFORMATION IS CORRECT  
TO UPDATE GO TO [www.mydocbill.com/qun1](http://www.mydocbill.com/qun1)

#### PRIMARY

Insurance

Group/Plan

ID Number

#### SECONDARY

Insurance

Address

City/State/Zip

Group/Plan

ID Number

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### About Your Statement

Have a billing question or concern about your statement?  
E-MAIL us at [qun1billing@mydocbill.com](mailto:qun1billing@mydocbill.com).

See Statement Details on Back

113380-365

QUANTUM RADIOLOGY PC  
PO Box 1259 Dept. #165956  
Oaks, PA 19456

Patient Name: LATNEY RUSSELL  
Invoice Number: 5962449  
Billing Questions: 1.855.871.1526



LATNEY A RUSSELL  
170 WASHINGTON ST APT T5  
HAVERHILL MA 01832-5795

113380 - 365

STATEMENT DATE	AMOUNT DUE	ACCOUNT NO.
06/01/22	\$486.00	QUN1

CHARGES AND CREDITS MADE AFTER  
STATEMENT DATE WILL APPEAR ON  
NEXT STATEMENT.

SHOW AMOUNT  
PAID HERE \$

MAKE CHECKS PAYABLE / REMIT TO:

QUANTUM RADIOLOGY PC  
PO BOX 3157  
INDIANAPOLIS, IN 46206-3157

0596244900048600000001222013QUN16

Pay Online: [www.mydocbill.com/qun1](http://www.mydocbill.com/qun1)



**Go Green**  
Pay Online | Update Info

www.mydocbill.com/qun1

## Summary of Service Charges

DATE	PROC CODE	UNITS	DETAILS OF SERVICES	CHARGES	PAY/ ADJ	INSUR. PENDING	PATIENT BALANCE
Patient: LATNEY RUSSELL				Referred By: SULIEMAN A. WAZEERUD-DIN Services Were Provided at: WELLSTAR AMC MAIN ER			
05-11-22	71046	1	X-RAY EXAM CHEST 2 VIEWS	53.00	21.20	0.00	31.80
05-20-22			GUARANTOR RESPONSIBILITY DATE (CHARGEID: 20602618)				
05-23-22			CASH PATIENT DISCOUNT		21.20		
05-11-22	70450	1	CT HEAD/BRAIN W/O DYE	205.00	82.00	0.00	123.00
05-20-22			GUARANTOR RESPONSIBILITY DATE (CHARGEID: 20602619)				
05-23-22			CASH PATIENT DISCOUNT		82.00		
05-11-22	70486	1	CT MAXILLOFACIAL W/O DYE	273.00	109.20	0.00	163.80
05-20-22			GUARANTOR RESPONSIBILITY DATE (CHARGEID: 20642788)				
05-23-22			CASH PATIENT DISCOUNT		109.20		
05-11-22	72125	1	CT NECK SPINE W/O DYE	279.00	111.60	0.00	167.40
05-20-22			GUARANTOR RESPONSIBILITY DATE (CHARGEID: 20642789)				
05-23-22			CASH PATIENT DISCOUNT		111.60		

Current	31-60 Days	61-90 Days	Over 90 Days
\$486.00	\$0.00	\$0.00	\$0.00

DATE DUE:	BALANCE DUE:
Upon Receipt	\$486.00

QUANTUM RADIOLOGY PC  
PO BOX 3157  
INDIANAPOLIS, IN 46206-3157  
1.855.871.1526

If your insurance has issued payment directly to you, please send us this payment immediately to stop the collection efforts.

When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

Patient Statement For: LATNEY A RUSSELL

Statement Date  
06/01/22

Account Number  
[REDACTED] QUN1

**STATEMENT**  
SEE REVERSE SIDE FOR IMPORTANT BILLING INFORMATION



Interested in staying well? Get the latest health tips, news, and more on our new health information website at [www.wellstar.org](http://www.wellstar.org)

**GUARANTOR INFORMATION:**

Latney A Russell  
170 WASHINGTON ST APT T5  
HAVERHILL, MA 01832-5795

Statement Date: 5/24/2022

Guarantor Name: Latney A Russell

Medical Record Number:

Payor Plan: No coverage associated with this account.

**This is not a bill. This is an itemization of your services for:**

Patient Name: Latney A Russell  
Account ID: [REDACTED] 213  
Guarantor ID: [REDACTED] 490

Admission Date: 05/11/22  
Discharge Date: 05/11/22  
Location: WS Atlanta Medical Center Hospital

Current Account Charges: 14,006.80

**Hospital Charges**

Rev Code	Service Date	Description	Qty	Amount
0250	05/11/2022	IBUPROFEN 600 MG TAB	1	4.80
0320	05/11/2022	HC XR CHEST 2VW	1	718.00
0350	05/11/2022	HC CT CERVICAL SPINE W/O CONTRAST	1	4,109.00
0350	05/11/2022	HC CT HEAD OR BRAIN W/O CONTRAST	1	3,647.00
0350	05/11/2022	HC CT MAXILLOFACIAL W/O CONTRAST	1	3,391.00
0450	05/11/2022	HC ER SERVICE LEVEL IV	1	2,137.00
<b>Total hospital charges:</b>				<b>14,006.80</b>

**Hospital Payments and Adjustments**

Date	Description	Amount
05/15/22	DISCOUNT (SELF-PAY, UNINSURED)	-10,645.17
<b>Total hospital payments and adjustments:</b>		<b>-10,645.17</b>

**Current account balance - THIS IS NOT A BILL:**

3,361.63

5779-WSEPIC56-4748945-3326146065; 22034094-1-1; 34077199-1; 1

130016



Mail Processing Center  
PO Box 3475 Toledo, OH 43607-0475



003671  
0101

RUSSELL, LATNEY A  
170 WASHINGTON ST APT T5  
HAVERHILL, MA 01832-5795

WELLSTAR HEALTH SYSTEMS INC.  
PO BOX 742625  
ATLANTA, GA 30374-2625



Please contact us at 470-245-9998 if you have questions regarding this document.

Office hours: 8 AM to 8 PM Mon-Thurs; 8 AM to 5:00 PM on Fri



We have filed to your insurance already. You can pay for the statement amount due in MyDocBill.



### QUANTUM RADIOLOGY PC

PO Box 3157  
INDIANAPOLIS, IN 46206-3157

@ mydocbill.com/qun1

1-855-204-9120

1-855-871-1526

qun1billing@mydocbill.com

### Amount Due

**\$486.00**

ACCOUNT OWNER  
LATNEY RUSSELL

STATEMENT CREATED  
10/26/2022

DUE DATE  
Upon Receipt

### Account Summary

INVOICE #  
6194013

PAYMENTS IN THE LAST 30 DAYS  
\$0.00

PENDING INSURANCE  
\$0.00

ACCOUNT NUMBER  
[REDACTED] QUN1

STATEMENT AMOUNT DUE  
**\$486.00**

TOTAL AMOUNT BALANCE  
\$486.00

### Guarantor Info

#### General Info

LATNEY RUSSELL  
170 WASHINGTON ST APT T5  
HAVERHILL, MA 01832

#### Primary Insurance Info

INSURANCE PROVIDER  
TUFTS

ADDRESS  
PO BOX 8115  
PARK RIDGE, IL 60068

GROUP/PLAN  
RX1144

ID NUMBER  
[REDACTED]

#### Secondary Insurance Info

None

**Summary of Service Charges**

PATIENT		RENDERING PROVIDER		SERVICE PROVIDED AT		REFERRING PROVIDER	
LATNEY RUSSELL		JOSEPH MOYERS		WELLSTAR AMC MAIN ER		SULIEMAN A WAZEERUD-DIN	
DOS	Proc Code	Units	Service Activity	Charges	Pay/ADJ	Pending Insur	Balance
5/11/2022	71046	1	X-RAY EXAM CHEST 2 VIEWS	\$53.00	\$21.20	\$0.00	\$31.80
6/14/2022			FILED PRIMARY TO TUFTS (NE023)				
10/10/2022			GUARANTOR RESPONSIBILITY DATE: (ChargeID: 20602618)				

PATIENT		RENDERING PROVIDER		SERVICE PROVIDED AT		REFERRING PROVIDER	
LATNEY RUSSELL		PHILIP LOUDEN		WELLSTAR AMC MAIN ER		SULIEMAN A WAZEERUD-DIN	
DOS	Proc Code	Units	Service Activity	Charges	Pay/ADJ	Pending Insur	Balance
5/11/2022	70450	1	CT HEAD/BRAIN W/O DYE	\$205.00	\$82.00	\$0.00	\$123.00
6/14/2022			FILED PRIMARY TO TUFTS (NE023)				
10/10/2022			GUARANTOR RESPONSIBILITY DATE: (ChargeID: 20602619)				
5/11/2022	70486	1	CT MAXILLOFACIAL W/O DYE	\$273.00	\$109.20	\$0.00	\$163.80
6/14/2022			FILED PRIMARY TO TUFTS (NE023)				
10/10/2022			GUARANTOR RESPONSIBILITY DATE: (ChargeID: 20642788)				
5/11/2022	72125	1	CT NECK SPINE W/O DYE	\$279.00	\$111.60	\$0.00	\$167.40
6/14/2022			FILED PRIMARY TO TUFTS (NE023)				
10/10/2022			GUARANTOR RESPONSIBILITY DATE: (ChargeID: 20642789)				

**Late Payment Breakdown**

CURRENT	31-60 DAYS	61-90 DAYS	OVER 90 DAYS
\$486.00	\$0.00	\$0.00	\$0.00

**We have filed to your insurance already. You can pay for the statement amount due in MyDocBill.**

*If your insurance has issued payment directly to you, please send us this payment immediately to stop the collection efforts. Please disregard this notice if you believe you have received it in error or if payment has already been made.*

**PLAINTIFF'S EXHIBIT "D"**

**HAVERHILL FAMILY OFFICE, LLC**

SHIAO-ANG SHIH, MD

MARIE P. ANDERSON, N.P

MERRIMACK MEDICAL CENTER  
62 BROWN STREET, SUITE 501  
HAVERHILL, MA 01830  
PHONE: 978-521-6555  
FAX: 978-521-1236  
HOLY FAMILY HOSPITAL AT  
MERRIMACK VALLEY

Date: 5/23/22

To Whom It May Concern,

My patient Latney Russell  
is out of work from  
5/11/22 to return on  
June 12-22

Sincerely,

Shiao-Ang Shih, MD

Signature:



IN THE SUPERIOR COURT OF GWINNETT COUNTY  
STATE OF GEORGIA

LATNEY A. RUSSELL,

Plaintiff,

VS.

FLIXBUS INC,

Defendant.

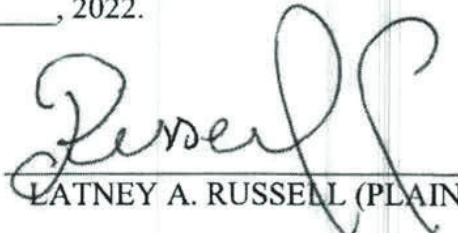
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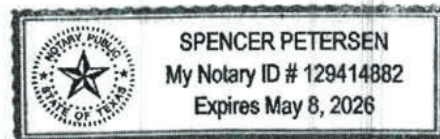
CIVIL ACTION FILE NO.:

22-A-09331-3

PLAINTIFF'S VERIFICATION

Personally appeared before the undersigned attesting officer authorized by law to administer oaths came **LATNEY A. RUSSELL**, who, being first duly sworn on oath deposes and states that the facts alleged in the above and foregoing Complaint are true and correct to the best of her knowledge and belief.

This 27<sup>th</sup> day of October, 2022.
  
 LATNEY A. RUSSELL (PLAINTIFF)
Sworn to (or affirmed) and subscribed before me, by means of ☒ physical presence or ☐ onlinenotarization, this 27<sup>th</sup> day of October 2022, by Latney Russell.



22-A-09331-

10/28/2022 3:45 PM  
TIANA P. GARNER, CLERK

## IN THE SUPERIOR COURT OF GWINNETT COUNTY

## STATE OF GEORGIA

LATNEY A. RUSSELL  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

PLAINTIFF

CIVIL ACTION  
NUMBER: \_\_\_\_\_

22-A-09331-3

VS.

FLIXBUS, INC

~~E/O Registered Agents, Inc.~~  
~~7901 4th Street N., Suite 300~~~~Saint Petersburg, FL 33702~~

DEFENDANT

FlixBus, Inc.

Registered Agents, Inc

300 Colonial Center Parkway  
Suit 100N

Roswell, GA 30076

## SUMMONS

## TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

LATNEY A. RUSSELL  
170 Washington Street, #T5  
Haverhill, MA 01843  
Ralatney@gmail.com

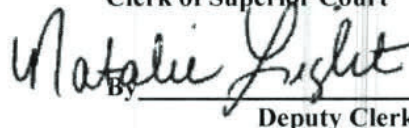
an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

28th day of October, 2022

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Tiana P. Garner

Clerk of Superior Court

  
By \_\_\_\_\_

Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

November 2, 2022

Latney Russell  
13901 Midway Rd  
STE: 102-465  
Farmers Branch, TX 75244

Gwinnett County Clerk of Superior Court  
75 Langley Dr,  
Lawrenceville, GA 30046

Tiana P. Garner  
Clerk of State Court  
Case Number 22-A09331-3

To Whom It May Concern.

I Latney Russell am filing a motion requesting my medical records be sealed.

Due to the nature of this case containing sensitive information, I am also requesting an expedited hearing via zoom.

Please be sure that all future correspondence is sent to the correct email address on file to avoid delays.

Sincerely,

DocuSigned by:  
  
ABB3FC15E138451...

Latney Russell  
E: ralatney@gmail.com



1/23/2023 12:07 PM  
TIANA P. GARNER, CLERK

## SHERIFF'S ENTRY OF SERVICE

Civil Action No.

Date Filed

Attorney's Address

SUPERIOR COURT

GEORGIA, FULTON COUNTY

Plaintiff

VS.

Name and Address of Party to be Served

Flixbus Inc

R/A Inc

300 Colonial Center PKWY

Fulton  
Roswell GA 30076

SHERIFF'S ENTRY OF SERVICE

Defendant

I have this day served the defendant \_\_\_\_\_ personally with a copy of the within action and summons.

I have this day served the defendant \_\_\_\_\_ by leaving a copy of the action and summons at this most place notorious place of abode in this county.

Delivered same into hands of \_\_\_\_\_ described as follows age, about \_\_\_\_\_ years; weight, about \_\_\_\_\_ pounds; height about \_\_\_\_\_ feet and \_\_\_\_\_ inches, domiciled at the residence of the defendant.

Served the defendant Flixbus, Inc clo Registered Agents, Inc a corporation by leaving a copy of the with in action and summons with Ashley Navarro (office Manager) in charge of the office and place of doing business of said Corporation in this County.

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of the same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon continuing notice to the defendant(s) to answer said summons at the place stated in the summons.

Diligent search made and defendant \_\_\_\_\_ not to be found in the jurisdiction of this court.

This 13<sup>th</sup> day of Jan 2023.

T. Desrosiers  
#2106 DEPUTY

SHERIFF DOCKET \_\_\_\_\_ PAGE \_\_\_\_\_

WHITE - CLERK; CANARY - PLAINTIFF; PINK - DEFENDANT

PERSONAL

NOTORIOUS

CORPORATION

TACK &amp; MAIL

NON EST

February 6, 2023

Latney Russell  
21595 S 231st Way  
Queen Creek, AZ 85142

Gwinnett County Clerk of Superior Court  
75 Langley Dr,  
Lawrenceville, GA 30046

Clerk of Superior Court  
Deputy Clerk Tiana P. Garner  
Case Number 22-A09331-3  
Latney Russell VS FlixBus Inc

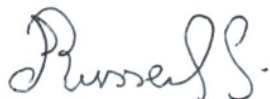
RE: Update of Address

To Whom It May Concern:

Please update my current address on file from 13901 Midway Rd STE: 102-465  
Farmers Branch, TX 75244 to my new mailing address 21595 S 231st Way  
Queen Creek, AZ 85142.

Should you have any questions regarding this letter, please feel free to reach out to  
me at your convenience.

Sincerely,



Latney Russell  
E: [ralatney@gmail.com](mailto:ralatney@gmail.com)  
P: (404) 423-0454



<https://researchga.tylerhost.net/CourtRecordsSearch/ViewCasePrint/179f6cd3a4e853b8b137917924fabe0d>

## Case Information

### RUSSELL VS FLIXBUS INC

22-A-09331-3

**Location**

Gwinnett - Superior Court

**Case Category**

Civil

**Case Type**Tort - Other Professional Negligence  
Tort\***Case Filed Date**

10/28/2022

**Judge**

Fluker, Deborah R.

**Case Status**

Open (Pending)

## Parties <sup>2</sup>

Type	Name	Nickname/Alias	Attorneys
Plaintiff	LATNEY A RUSSELL		Pro Se
Defendant	FLIXBUS INC		Pro Se

## Events <sup>6</sup>

Date	Event	Type	Comments	Documents
10/28/2022	Filing	Complaint with Jury Demand	Plaintiff's Complaint and Statement of Claim	2022.10.28 Complaint and Statement of Claim for Flixbus (Russell).pdf
10/28/2022	Filing	Verification	Plaintiff's Verification	2022.10.28 Signed Verification for Flixbus (Russell).pdf
10/28/2022	Filing	Summons	Plaintiff's Summons	2022.10.28 Summons for Flixbus (Russell).pdf
11/2/2022	Filing	Motion to Seal	Medical Records	GWINNETT motion to seal.pdf
1/23/2023	Filing	Sheriff/Marshall's Service	Affidavit of Service Document	affidavit of service 001.pdf
2/6/2023	Filing	Change Of Address	Address Change	Change of address update.pdf

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